

DONALD LEJEUNE vs STATE FARM FIRE AND CASUALTY
Stephanie Lee 09/01/2022

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT COURT OF OKLAHOMA

DONALD LEJEUNE, an)
individual,)
Petitioner,)
vs.) Case No. 21-CV-01132-G
STATE FARM FIRE AND CASUALTY)
COMPANY,)
Respondent.)

DEPOSITION OF STEPHANIE LEE
TAKEN ON BEHALF OF THE RESPONDENT
IN EDMOND, OKLAHOMA
ON SEPTEMBER 1, 2022

WORD FOR WORD REPORTING, L.L.C.
620 NORTH ROBINSON
SUITE 202
OKLAHOMA CITY, OKLAHOMA 73102
(405) 232-9673

REPORTED BY: JENESSA KENDALL KALSU, CSR

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1 Q Okay. And so you said in this case that
2 Greg Cannon went to the property for an inspection,
3 but you also had another independent contractor do
4 an inspection, as well?

5 A Yes, sir.

6 Q Who was that?

7 A James Ford, and he works for Yates Roofing
8 & Construction.

9 Q Okay. James works for Yates?

10 A Yes, he does.

11 Q Does James do a lot of inspections for
12 Coppermark?

13 A He had done a handful. He hasn't done any
14 in, I don't know, eight, ten months maybe. Like I
15 said, we just used a few different people during a
16 short period of time last year when we had gotten a
17 large influx of claims.

18 Q Okay.

19 A We wanted to just be able to get to them
20 all timely.

21 Q All right. That makes sense.

22 All right. If we could take a quick break
23 for a minute.

24 A Sure.

25 (Short break.)

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1 A That's correct. They go out by
2 themselves. They look for anything and everything
3 they see. We ask them to photograph it. Even
4 things they don't see, photograph it. We will make
5 a determination of, you know, "Is it damage, what
6 kind, is it covered?"

7 Q Okay. Do you give them any written
8 instructions before they go out and look at a
9 property?

10 A No.

11 Q All right. Do you tell them what type of
12 loss is being alleged before they go out there?

13 A No.

14 Q All right. And so is it just a "Go out,
15 take any potential damage you see and send us
16 pictures"?

17 A Yes.

18 Q Okay. In this case, do you know if the
19 inspector did any -- reviewed the interior or just
20 did the exterior of the property? And feel free to
21 look.

22 A I don't believe there was -- I don't
23 believe that there was interior inspection. I don't
24 know that there was any interior damage, according
25 to Mr. LeJeune at the time.

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1 No, we -- there's -- there was no interior
2 inspection, based on Mr. LeJeune telling us that, at
3 the time, he didn't have any interior damage.

4 Q Okay. And so Coppermark's estimate and
5 report did not include any interior damage?

6 A That is correct.

7 Q Okay. Now, you said that both -- was it
8 Ken Yates?

9 A Who?

10 Q Or no, James Ford. So both James Ford and
11 Greg inspected this property. Are both Mr. Ford and
12 Greg's pictures in this report or just one or the
13 other?

14 A No. These are all James Ford's photos.
15 They were corroborated and just kind of relooked at
16 and verified by Greg Cannon.

17 Q And was there a specific reason Greg went
18 out to reverify?

19 A Quality control.

20 Q Does that happen in every case?

21 A No.

22 Q Okay.

23 A Random.

24 Q And so that was more of a just checking to
25 make sure -- making sure this is okay, not a --

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1 there was no specific impetus that made Greg go out
2 for a second time?

3 A Correct.

4 Q Okay.

5 A Just, "Was this thorough? Was everything
6 included?" You know, whether, we -- we try to make
7 sure that whoever is taking photos is -- you know,
8 for us isn't -- isn't trying to -- isn't crossing
9 that threshold of trying to make a -- a damage
10 determination, coverage determination or anything of
11 that sort.

12 Q Okay. And then -- so all the pictures
13 included in this report, starting on Bates Range
14 516, were pictures from James Ford?

15 A That is correct.

16 Q Do you know if, on this case, Greg found
17 that any pictures -- anything was done wrong as far
18 as the pictures taken or inspection or anything
19 missed by Mr. Ford?

20 A No.

21 Q Okay. And then once Mr. Ford sends in the
22 pictures, who makes the determination whether or not
23 this is damage?

24 A Well, so we've already verified covered
25 damage prior to. Either myself and Lauren or just

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1 myself would look at the photos to see what all
2 needs to be included with the scope.

3 Q Okay. And you're saying the photos from
4 Mr. Ford?

5 A Yes, sir.

6 Q Okay. So do you know, in this case, if it
7 was you or Lauren who made that determination?

8 A I believe we did it together.

9 Q Okay. And when you're doing that
10 determination, are you looking for damage, or are
11 you specifically looking for covered damage?

12 A Well, we look for all damage. But we look
13 for covered damage, and then if there's anything,
14 you know, consequential that would need to be
15 replaced to indemnify on the covered damage, just
16 what to include in the estimate from these
17 photographs.

18 Q Does your estimate include only covered
19 damage, or does it also include non-covered?

20 A I mean, that's sort of a trick question.

21 Q Gotcha.

22 A But it would only include covered damage.

23 Q So you're saying only covered damage and
24 then other repairs, if necessary, they -- they may
25 not be technically covered damages, but because